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February 3, 2006

Certification of CPNI Filing, February 6, 2006

EB Docket No. 06-36 / EB-06-TC060 / Cal-Ore FCC 499 Filer ID # 821160

Electronically filed with the FCC  
With copies to [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov) and [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)

Cal-Ore Long Distance. ("COLD") is hereby complying with the January 30, 2006 Public Notice in which the Enforcement Bureau directs all telecommunications carriers to submit a compliance certificate to the Commission as required by Section 64.2009 of the Commission's rules.

COLD hereby certifies that they are in compliance with Section 64.2009 of the Commission's rules for the period ending December 31, 2005 and provides an accompanying statement explaining how COLD operating procedures ensure compliance with the FCC rules.

COLD complies with Section 222 of the Communications Act of 1934, as amended (the "Act"), that requires telecommunications carriers protect the privacy of customer proprietary network information ("CPNI").

Exhibit A provides a statement explaining how COLD ensures that it is in compliance with the rules in §64.2009.

Sincerely,

Edward B Ormsbee  
Chairman of the Board

**Statement of Compliance with CPNI Procedures**

**Process:**

1. All marketing request utilizing CPNI require approval by an Officer of COLD. Disclosures of CPNI for marketing campaigns will be listed in the CPNI notebook along with backup documentations maintained by the Front Office Manager. The records must include a description of each campaign, the specific CPNI used in the campaign, and what products/services were offered as part of the campaign.
2. The Front Office Manger will maintain a list of customers with "Opt-Out" certifications and a history of notices to customers.
3. In instances where the "Opt-Out" mechanisms fail to such a degree that consumers' inability to "Opt-Out" is more than an anomaly, COLD will provide written notice to the Commission within five business days. The notice, in the form of a letter, will include the carrier's name, a description of the "Opt-Out" mechanisms used, the problems experienced, the remedy proposed and when implemented, whether the relevant state commissions have been notified or taken any action, a copy of the notice provided to customers, and contact information. Such notice will be submitted even if the carrier offers other methods by which consumer may "Opt-Out".
4. All front office personal will be trained on CPNI requirements and procedures annually, anytime new requirements are implemented and at time of hire.
5. Updates of customer information are provided to the E-911 database including the customer name, phone number, whether it is a residential or business, and service location address. If the E-911 database provider is doing physical addressing in the field for areas lacking formal addresses, COLD will provide the customer name, phone number, and service location only if the database provider submits a signed, notarized statement that the data will only be used for E-911 addressing purposes.
6. If proper approved legal documents, including an approved Court Order, are received, COLD will provide law enforcement with the requested information after determining that the request is in compliance with current laws and regulations. Records of all request related to CALEA compliance and/or releases of CPNI information will be securely maintained for a minimum period of ten years.
7. Annually, an Officer of COLD will certify personal knowledge that COLD has maintained compliance with the above operating procedures and that those procedures are adequate to ensure compliance with Federal laws and regulations.



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WC Docket No. 05-196

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I, Edward B Ormsbee, Chairman of the Board for Cal-Ore Long Distance ("COLD") do hereby certify that COLD is fully compliant with the FCC's CPNI rules 47 CFR section 64.2009 and EB-06-TC-060. I have personal knowledge that the procedures we have adopted are adequate to ensure compliance with the FCC rules. To market service outside the customer's existing service relationship, we obtain customer approval by using the "Opt-Out" Method. Our operation procedures follow the rules for the "Opt-Out" Method. The customer notification provides sufficient information to enable the customer to make an informed decision.

Chairman of the Board